# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

MAE BARBEE, ET AL.,	)
Plaintiffs,	) Case No: 3:19-cv-00119
	) JURY TRIAL DEMANDED )
V.	Collective and Class Action
NAVIHEALTH, INC.,	<ul><li>) Judge Waverly D. Crenshaw</li><li>) Magistrate Judge Alistair Newbern</li></ul>
Defendant.	) Wagistrate Judge Alistan Newbern

# PLAINTIFFS' UNOPPOSED MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES

For the reasons set forth in the attached memorandum, supporting declaration, and exhibits, McGillivary Steele Elkin LLP, Yezbak Law Offices PLLC, Seigel Law Group, PLLC, the Hedgpeth Law Firm, and Lee & Braziel, LLP ("Class Counsel"), on behalf of Plaintiffs and the Settlement Class Members, respectfully move the Court for an award of attorneys' fees in the amount of \$1,563,332.00, which is equal to one-third (33.33%) of the Maximum Settlement Amount (Dkt. 92-1, ¶ 1.10). Class Counsel also seek reimbursement of litigation expenses in the amount of \$15,751.13.

**September 14, 2020** 

Respectfully,

/s/Molly A. Elkin Molly A. Elkin Hillary D. LeBeau MCGILLIVARY STEELE ELKIN LLP 1101 Vermont Ave., N.W., Suite 1000

Washington, DC 20005

Tel.: (202) 833-8855 Fax: (202) 452-1090 mae@mselaborlaw.com hdl@mselaborlaw.com

# /s/Charles P. Yezbak

Charles P. Yezbak, III

N. Chase Teeples

YEZBAK LAW OFFICES PLLC

2021 Richard Jones Road, Suite 310A

Nashville, TN 37215

Tel.: (615) 250-2000

Fax: (615) 250-2020

yezbak@yezbaklaw.com

teeples@yezbaklaw.com

## /s/ Jack Siegel

Jack Siegel

Texas Bar No. 24070621

SIEGEL LAW GROUP, PLLC

2820 McKinnon, Suite 5009

Dallas, Texas 75201

Tel.: (214) 790-4454

jack@siegellawgroup.biz

## /s J. Derek Braziel

J. Derek Braziel

Travis Gasper

LEE & BRAZIEL, L.L.P.

1801 N. Lamar Street, Suite 325

Dallas, Texas 75202

Tel.: (214) 749-1400

Fax: (214) 749-1010

jdbraziel@l-b-law.com

gasper@l-b-law.com

## /s/ Travis M. Hedgpeth

Travis M. Hedgpeth

THE HEDGPETH LAW FIRM, PC

5438 Rutherglenn Drive

Houston, Texas 77096

Tel.: (512) 417-5716

travis@hedgpethlaw.com

Counsel for Plaintiffs and The Settlement Classes

## **CERTIFICATE OF SERVICE**

The undersigned attorney certifies that a copy of the foregoing has been filed via the Court's ECF filing system on September 14, 2020 and transmitted to the following counsel of record:

Robert W. Horton Mary Leigh Pirtle Bass, Berry & Sims (Nashville Office) 150 Third Avenue South **Suite 2800** Nashville, TN 37201 (615) 742-6232 Fax: (615) 742-2806

Email: rhorton@bassberry.com Email: mpirtle@bassberry.com

/s/ Molly A. Elkin

Molly A. Elkin McGILLIVARY STEELE ELKIN LLP 1101 Vermont Ave., N.W. **Suite 1000** Washington, DC 20005

Phone: (202) 833-8855 Fax: (202) 452-1090 mae@mselaborlaw.com